

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHIRLEY MACK on behalf of herself and)	
others similarly situated,)	1:11-cv-9008
Plaintiffs,)	
)	Judge Kim (by consent)
v.)	
)	
GENERAL MOTORS FINANCIAL COMPANY,)	JURY DEMANDED
INC. f/k/A AMERICREDIT CORP.,)	
Defendant.)	

PARTIES' JOINT STIPULATION REGARDING CLASS CERTIFICATION MOTION

Recognizing that plaintiff has filed a motion for class certification the same day as the complaint in an attempt to prevent this putative class action from being mooted pursuant to *Damasco v. Clearwire Corp.*, 662 F.3d 891 (7th Cir. 2011), the parties wish to take the motion for class certification off the Court's docket to permit them time to do discovery.

Therefore, defendant agrees to provide plaintiff with seven days written notice before making an individual settlement offer or individual Rule 68 offer. This seven day period is intended to permit plaintiff to re-file the motion for class certification before such offer is made. Plaintiff agrees to withdraw his class certification motion without prejudice.

The parties thus jointly and respectfully request that the Court enter an order withdrawing plaintiff's motion for class certification without prejudice.

Respectfully submitted,

/s/Alexander H. Burke
Counsel for Plaintiff

BURKE LAW OFFICES, LLC

155 N. Michigan Ave., Suite 9020
Chicago, IL 60601
(312) 729-5288
(312) 729-5289 (fax)
ABurke@BurkeLawLLC.com

/s/Chad R. Fuller
Counsel for Defendant

Goodwin Procter, LLP
4365 Executive Drive, 3rd Floor
San Diego, CA 92121
(858) 202-2712
(858) 457-1255 (fax)
CFuller@goodwinprocter.com

Howard L. Teplinsky
BEERMANN | PRITIKIN | MIRABELLI | SWERDLOVE LLP
161 North Clark Street, Suite 2600
Chicago, Illinois 60601
312-621-9700
312-621-0909 (fax)
hteplinsky@beermannlaw.com

CERTIFICATE OF SERVICE

I, Alexander H. Burke, certify that on February 8, 2012, I served this document via United States mail and email to defendant at:

And by email to local counsel Howard Teplinsky at hteplinsky@beermannlaw.com

/s/Alexander H. Burke